

Message

From: Greg Schrab [gschrab@sm-energy.com]
Sent: 10/15/2019 3:15:22 PM
To: Lundelius, Diana [Lundelius.Diana@epa.gov]
Subject: RE: Clean Air Act NSPS and NESHAP Compliance Reporting and Notifications

Thanks Diana, this helps.

Thanks,

Greg

Greg Schrab, CHMM, CSP
Corporate EH&S Manager

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From: Lundelius, Diana <Lundelius.Diana@epa.gov>
Sent: Tuesday, October 15, 2019 8:26 AM
To: Greg Schrab <gschrab@sm-energy.com>
Subject: Clean Air Act NSPS and NESHAP Compliance Reporting and Notifications

WARNING: This email originated from outside of SM Energy. Do not click links or open attachments unless you recognize the sender and are expecting the content and know it is safe.

Hello, your question was forwarded to me for reply.

Thank you for asking for further clarification.

Here is the detailed explanation that I have been forwarding to companies who inquire about our Air Enforcement mail reduction initiative.

It usually answers most of the questions people have about this.

I believe it contains the answers to your question.

EPA Region 6 must continue to receive paper copies of Title V Annual Compliance Certifications and deviation reports. We do not have the server space to accept these electronically, and the rule does not provide for electronic submission at this time. In the future, we hope this will change. Please send your Title V certifications and deviation reports to: **USEPA Region 6, Air Enforcement Branch, Mail Code 6ECDA, 1201 Elm Street, Suite 500, Dallas, TX 75270. Please discontinue sending other courtesy copies under federal rules for monitoring, testing, annual compliance reports and excess emission reports to EPA Region 6 for those rules that the state is delegated.**

EPA Region 6 will continue to accept notifications and reporting for the following:

- **Paper copies** of Title V compliance certifications and deviation reports. Part 70 currently does not have a provision for allowing electronic submission or for EPA to waive notification. Using the state's Title V reporting and deviation forms is fine, just make ONE extra copy to send to Region 6;
- Performance testing, RATA and notifications for electric generation units (ORIS) under Part 75 acid rain (emailed to R6Part75@epa.gov);
- NSPS OOOO notifications and reports for **NM and AR only**, and NSPS OOOOa notifications and reports (**all states except TX**), emailed to R6WellCompletion@epa.gov; **PAPER COPIES OF THESE REPORTS ARE NO LONGER ACCEPTED.**
- Test reports and notifications for NSPS JJJJ and MACT ZZZZ (**for AR only**), emailed to R6EngineRules@epa.gov;
- Any rule in Part 60, 61 or 63 for which the state is **not delegated** (e.g. Part 68 RMP, specific Part 63 NESHAP, minor sources in AR); and,
- Section 608/609 refrigerant notifications (Part 82).

For future reference, please send all testing notifications and test reports to the state's regional office in which the facilities are located.

Check with the state agency to determine if you may submit the documents by email or through an alternative electronic method.

While EPA will continue to receive engine reports electronically, if the state is delegated for these rules, then you do not need to submit a copy to Region 6, except continue sending for facilities in AR.

DO continue to report and submit data via CEDRI if the rule requires it. The states and EPA are reviewers who can access the data submitted via CEDRI, except AR, which does not use or access CEDRI. You can access the list of rules requiring CEDRI reporting and links any available templates on the CEDRI web site, <https://www.epa.gov/electronic-reporting-air-emissions/compliance-and-emissions-data-reporting-interface-cedri>.

The delegation status of federal rules for other Region 6 states may be found on each state's Enforcement and Compliance page through the EPA Region 6 web site. Click on the state at the right hand side on the EPA Region 6 main web page, <https://www.epa.gov/aboutepa/epa-region-6-south-central>, scroll down and click on Compliance and Enforcement, then scroll down and click on Air Enforcement to find the links for delegation status tables and documents for Part 60, 61 and 63 federal rule subparts for that state. When you click on the Part, a table will come up with the individual subparts and a Yes or No for delegation status. Scroll through the table at lower right to get to the subpart(s) you are interested in. As delegation status changes for new or modified rules, the federal register notices will be posted to the state delegation pages. Where you see the state is delegated for a subpart, do not send courtesy copy notifications or reports to EPA Region 6, except as noted previously. Due to personnel changes within Air Enforcement and the change in fiscal year beginning October 1, 2019, there may delays in posting new delegation notices to the Region 6 web page.

Diana L Lundelius CHMM
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"Courage is the willingness to proceed with positive change, even if the outcome is uncertain."

Connect with me on Linked In, <https://www.linkedin.com/in/diana-l-lundelius-chmm-a6b98917/>

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Tuesday, October 15, 2019 6:49 AM
To: Lundelius, Diana <Lundelius.Diana@epa.gov>
Subject: FW: Clean Air Act NSPS and NESHAP Compliance Reporting and Notifications

Hi Diana:

I looked in the mail room and the poster isn't on the wall anymore. Can you help answer this question?

Thanks,
Margaret

From: Greg Schrab <gschrab@sm-energy.com>
Sent: Friday, October 11, 2019 3:44 PM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>
Subject: Clean Air Act NSPS and NESHAP Compliance Reporting and Notifications

Margaret,

I have a question regarding this letter that we had forwarded to us by Ecotest, who is our engine testing contractor.

Since Ecotest received the letter, I'm assuming it's regarding notices/reporting Ecotest has sent to EPA Region 6 regarding NSPS JJJJ or NESHAP ZZZZ engine tests.

Anyway, I've looked at the two websites listed in the letter. The first link just shows a list of various facilities under enforcement actions in Texas. There are no apparent links for viewing NSPS or NESHAP rules that have been delegated to TX. The second link does not appear to include a current, up-to-date list of all FR delegation documents. So my question is simple, are operators in TX still required to submit applicable notifications and annual reports to EPA Region 6 for NSPS OOOOa?

Thanks,

Greg

Greg Schrab, CHMM, CSP
Corporate EH&S Manager

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